

### **REMARKS**

The Office Action dated July 18, 2007 has been received and carefully noted. The following remarks are submitted as a full and complete response thereto. Claims 31-33, 35-43, 45-56 and 58-75 are submitted for consideration.

As a preliminary matter, the Office Action indicated that claims 54 and 61 include allowable subject matter, and would be allowable if amended to be in independent form. Based on the arguments presented below, Applicant submits that all of the presently pending claims are allowable and requests reconsideration of the presently pending claims.

Claims 31-33, 35, 37-43, 45-51, 55-56, 58-60, 62 and 64-75 were rejected under 35 U.S.C. 103(a) as being unpatentable over U.S. Patent No. 6,424,638 to Ray (hereinafter Ray) in view of U.S. Patent No. 6,882,844 to Keski-Heikkilä (hereinafter Keski-Heikkilä) or U.S. Patent No. 6,925,074 to Vikberg (hereinafter Vikberg) and U.S. Patent No. 6,289,221 to Ritter (hereinafter Ritter). According to the Office Action, Ray teaches all of the elements of claims 31-33, 35, 37-43, 45-51, 55-56, 58-60, 62 and 64-75 except for teaching using a cell identity information structure of a second telecommunication network. Thus, the Office Action combined the teachings of Ray and Keski-Heikkilä or Vikberg and Ritter to yield all of the elements of claims 31-33, 35, 37-43, 45-51, 55-56, 58-60, 62 and 64-75. The rejection is traversed as being based on references that neither teach nor suggest the combination of features recited in each of claims 31-33, 35, 37-43, 45-51, 55-56, 58-60, 62 and 64-75.

Independent claim 31, upon which claim 32, 33, 36-41 and 64-66 depend, recites an apparatus for a first telecommunication network, the apparatus including a data store to store a cell identity information for a cell of the first telecommunication network using a cell identity information structure of a second telecommunication network. The apparatus is configured to allow the cell of the first telecommunication network to be identified as a neighboring cell by a cell of the second telecommunication network.

Independent claim 42, upon which claims 43, 45-48 and 67-69 depend, recites a handover module that is arranged to receive cell identities from cells of a first telecommunications network and a second telecommunication network. Cell identities of cells from both the first telecommunications network and second telecommunication networks use the structure of the second telecommunication network. The handover module is arranged to determine the need for changing serving cells and to initialize the process of changing a serving cell to another cell. The module is used for providing seamless mobility between the first telecommunications network and the second telecommunication network.

Independent claim 49, upon which claims 50-54 and 70-72 depend, recites a method including transmitting a cell identity information to a mobile station, the cell identity information being stored in a first telecommunication network using a cell identity information structure of a second telecommunication network. The method is used for seamless mobility between the first telecommunication network and the second telecommunication network.

Independent claim 55, upon which claims 56, 58-63 and 73-75 depend, recites a mobile station including means for communicating with a first telecommunication network and a second telecommunication network and means for receiving a cell identity information for a cell of the first telecommunication network using a cell identity information structure of the second telecommunication network.

Applicant submits that the cited references of Ray, Keski-Heikkilä, Ritter and Vikberg do not teach or suggest the combination of elements in any of the presently pending claims.

Ray teaches a system and method for performing a handover of a call between different types of systems. When a serving mobile switching center (MSC) determines that there is not another MSC to which a handover can be performed, the serving MSC sends a message to an Internet Gatekeeper that maintains a database of all existing wireless systems within the area served by the Internet Gatekeeper. The Internet Gatekeeper chooses a target MSC of another wireless system, if possible, and transmits the identity of this target MSC to the serving MSC. Thereafter, the serving MSC performs the handover to the target MSC by routing signaling messages to the target MSC. See at least the Abstract.

Keski-Heikkilä teaches a GSM mobile communication system that includes multiple base stations which are connected to a base station controller (BSC) which is in turn connected to a cell broadcast server. The cell broadcast server includes a supervision software that is used to create or assign an extra, permanent identity to each

base station. The permanent identity assigned to each base station is included in the information signal that is transmitted by the base station to all mobile equipments located in its coverage area or region. The supervision software and base station controller are responsible for continuing to maintain or preserve the same identity for each base station, even after changes are made to the network. Keski-Heikkilä further teaches the GSM mobile communication system includes a terminal equipment that includes means for changing a subscriber profile on the basis of the identity of the particular base station that is currently serving that terminal equipment. The means receives information signal, including the permanent identity designation of the base station currently serving the terminal equipment. Changes in the subscriber profile are then made on the basis of the received or known permanent identity designation of the base station in whose communication coverage area the terminal equipment is currently located. Col. 3, line 11-Col. 4, line 12.

Ritter discloses that a mobile telephone system includes a plurality of coupled based station. Each base station has a first and second radio communications apparatus which operate to effect radio communications with least one mobile station via first and second radio signals with radio frequencies which occupy common part of the radio frequency spectrum. A frequency re-use pattern associated with the first radio communications apparatus is substantially matched to a frequency re-use pattern associated with the second radio communications apparatus.

Specifically, Ritter discloses a dual mode mobile radio telephone system formed from a GSM system in combination with a TD/CDMA system. Three base stations are shown to be made of a GSM communications unit and a TD/CDMA communications unit. Data to be communicated by the base station is fed from either the GSM communications unit or the TD/CDMA communications unit to either of three directional antennas, via an antenna coupling means. Data is communicated between a mobile station, roaming within the mobile radio network and a base station, with which the mobile station is affiliated, by either the GSM communications unit or the TD/CDMA communications unit via radio signals modulated in accordance with either of these two systems. Each base station is assigned at least one different radio frequency carrier within a frequency re-use pattern such that a group of cells or a group of cell sectors forms a cluster in which each cell, or cell sector has a different carrier or plurality of different carriers. Thereafter in accordance with the frequency re-use pattern the cluster is repeated for the other base stations throughout the network. For a third generation mobile radio system, a completely different frequency re-use pattern may result, and as such may be incompatible with frequency planning established for the GSM system. With a third generation system such as TD/CDMA, a frequency re-use pattern of the TD/CDMA system may be matched to that of the GSM system with the effect that the dual mode mobile radio network may communicate with a mobile station using the GSM communications unit or the TD/CDMA communications unit, with both the resulting frequency re-use plans and the spectral use substantially matched. As such, a cluster of

cells may operate in either a mode in which communication is affected via the GSM communications unit, or via the TD/CDMA communication unit, or indeed both systems may be active contemporaneously, with communications with different mobiles subscribers being effected on different time slots.

Vikberg discloses a mobile telecommunications network with an access network portion having several base station systems that can communicate with a core network portion. The base station systems are adapted to communicate with mobile terminals over a licensed public mobile network air interface and with the core network portion over a predetermined network interface. The network also includes at least one local base station system that is arranged to communicate with the core network portion over the predetermined network interface. This local base station system is further adapted to communicate with mobile terminals over an unlicensed radio interface. The local base station system makes use of an existing fixed network based on IP.

Applicant submits that Ray, Keski-Heikkilä, Ritter and/or Vikberg do not teach or suggest the combination of elements recited in the pending claims. Each of the independent claims 31, 42, 49 and 55, in part, recites a data store to store a cell identity information for a cell of the first telecommunication network using a cell identity information structure of a second telecommunication network. The Office Action acknowledged that Ray does not teach these features.

However, the Office Action continued to allege that Col. 4, lines 39-46 of Keski-Heikkilä teaches a permanent cell ID which can be viewed as a common cell ID format.

The Office Action also continued to allege that the present invention uses one network's structure to represent the cell ID while Keski-Heikkilä uses a method whereby the "permanent" format can be used in a similar manner, for example, for sending the mobile station the permanent cell ID. As noted in the previous Response, the cited section of Keski-Heikkilä discloses that a supervision software of a server creates and assigns a permanent base station identity for uniquely identifying the base station independent of the mobile communication network configuration changes, wherein the permanent base station identity designation is separate from a cell identity of a global cell identifier of the base station.

The present invention, as recited in the independent claims, is directed to an apparatus operating in conjunction with two different telecommunications networks. For example, the claims of the present invention, as supported by the specification, may be directed to a GSM network and a WLAN. Keski-Heikkilä, on the other hand, is directed to base stations in one telecommunications system. There is no teaching or suggestion in Keski-Heikkilä of a second telecommunications system. Specifically, Keski-Heikkilä is directed to assigning permanent identities to base stations in a GSM network. According to Keski-Heikkilä, the permanent identities of the base stations are used to update the subscriber profile of a terminal equipment, of the GSM network, on the basis of the base station that is currently serving the terminal equipment. Thus, there is no teaching or suggestion in Keski-Heikkilä of storing a cell identity information for a cell of the first

telecommunication network using a cell identity information structure of a second telecommunication network, as recited in the presently pending claims.

Furthermore, as noted above, Keski-Heikkilä teaches that the subscriber profile of the terminal equipment is updated to include the permanent identity of the currently serving base station. There is no teaching or suggestion in Keski-Heikkilä of using the base stations' identity structures in the terminal equipment. Thus, Applicant submits that Keski-Heikkilä also does not teach or suggest storing a cell identity information for a cell of the first telecommunication network using a cell identity information structure of a second telecommunication network, as recited in the presently pending claims.

Ritter does not cure any of the deficiencies of Keski-Heikkilä and/or Ray as outlined above. Ritter merely discloses a dual mode mobile radio telephone system formed with a GSM system and a TD/CDMA system. In Ritter, a mobile subscriber may communicate with either the GSM system or the TD/CDMA system, or both. Ritter also discloses that a frequency re-use pattern of the TD/CDMA system may be matched to that of the GSM system with the effect that the dual mode mobile radio network may communicate with a mobile station using the GSM communications unit or the TD/CDMA communications unit, with both the resulting frequency re-use plans and the spectral use substantially matched. However, Ritter does not teach or suggest a data store for storing a cell identity information for a cell of the first telecommunication network using a cell identity information structure of a second telecommunication network, as recited in the pending claims. Thus, Applicant submits that Ritter also does not teach or



suggest storing a cell identity information for a cell of the first telecommunication network using a cell identity information structure of a second telecommunication network, as recited in the presently pending claims.

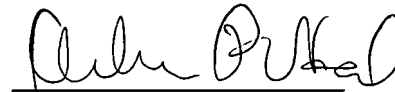
Vikberg also does not seem to cure the deficiencies of Ray, Keski-Heikkilä and/or Ritter. Specifically, Vikberg also does not seem to teach or suggest storing a cell identity information for a cell of the first telecommunication network using a cell identity information structure of a second telecommunication network, as recited in the presently pending claims. Therefore, Applicant respectfully asserts that the rejection under 35 U.S.C. §103(a) should be withdrawn because neither Keski-Heikkilä, Ray, Ritter nor Vikberg, whether taken singly or combined, teaches or suggests each feature of claims 31, 42, 49 and 55 and hence, dependent claims 32, 33, 36-41, 43, 45-48, 50-54, 56 and 58-75 thereon.

As noted previously, claims 31-33, 35-43, 45-56 and 58-75 recite subject matter which is neither disclosed nor suggested in the prior art references cited in the Office Action. It is therefore respectfully requested that all of claims 31-33, 35-43, 45-56 and 58-75 be allowed, and this application passed to issue.

If for any reason the Examiner determines that the application is not now in condition for allowance, it is respectfully requested that the Examiner contact, by telephone, the applicant's undersigned attorney at the indicated telephone number to arrange for an interview to expedite the disposition of this application.

In the event this paper is not being timely filed, the applicant respectfully petitions for an appropriate extension of time. Any fees for such an extension together with any additional fees may be charged to Counsel's Deposit Account 50-2222.

Respectfully submitted,



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